

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF VIRGINIA
Richmond Division**

GOLDEN BETHUNE-HILL, *et al.*,)
Plaintiffs,)
v.)
VIRGINIA STATE BOARD OF) Civil Action No. 3:14-cv-852
ELECTIONS, *et al.*,)
Defendants,)
)

**NOTICE OF CORRECTION TO PROPOSED REMEDIAL PLAN OF INTERESTED
PARTY VIRGINIA STATE CONFERENCE OF NAACP BRANCHES**

Interested Party Virginia State Conference of NAACP Branches (“the Virginia NAACP”), by and through its undersigned counsel, respectfully notifies the Court of a correction to the Proposed Legislative Redistricting Plan Submitted by the Virginia State Conference of NAACP Branches (Dkt. 286), which was filed on November 2, 2018 in connection with the Virginia House of Delegates remedial redistricting process.

In providing information to the Court in response to the order on November 16, 2018 (Dkt. 298), Counsel discovered an error relating to the data for proposed election districts in southeastern Virginia, specifically Districts 79 and 89 in the Norfolk area. In reviewing the underlying census block assignments for these districts, Counsel found that the underlying data in the mapping software did not incorporate discrete corrections issued from the U.S. Census Bureau.

Specifically, two census blocks (Block 51710 0038.001000 and Block 51710 0009.02 1044) have been updated by census officials to correct clerical errors for their enumeration in the Norfolk, Virginia area. Caliper, the mapping software company, initially provided a dataset with only the uncorrected information for these census blocks. Once the corrected population data is applied, the two election districts as presented have population deviations that exceed acceptable levels. Correcting this clerical error to balance the population appropriately would affect Districts 79 and 89, as well as approximately five other immediately adjacent districts.

Counsel notes the error in this portion of the proposal and respectfully requests leave from the Court to submit limited adjustments to the file, which would account for the clerical error relating to the census block assignments in the Norfolk area. If permitted, Counsel is prepared to submit these limited corrections to the Court not later than close of business November 19, 2018.

In the alternative, Counsel respectfully requests that the Court review the districts outside of the Norfolk area contained in the Virginia NAACP's presentation of a Proposed Legislative Redistricting Plan.

The Virginia NAACP respectfully requests that the Court take notice of this correction.

Submitted this 16th day of November, 2018.

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Counsel for the Virginia NAACP

CERTIFICATE OF SERVICE

I hereby certify that on this 16th day of November, 2018, I have electronically filed the foregoing document with the Clerk of Court using the United States District Court, Eastern District of Virginia, Richmond Division, CM/ECF system, which will then send a notification of such filing (NEF) to all counsel of record, including Plaintiffs, Defendants, and Defendant-Intervenors.

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